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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BENJAMIN D. MORROW,

15 Defendant.

) Case No: 3:19-cr-00041-MMD-CBC

) **INDICTMENT CHARGING**
) **VIOLATIONS OF:**

) Distribution of child pornography, in
) violation of 18 U.S.C. §§ 2252A(a)(2) and
) (b)(1) (Counts 1 and 2);

) Advertising of child pornography, in
) violation of 18 U.S.C. §§ 2251(d)(1)(A)
) and (e) (Count 3);

) Receipt of child pornography, in violation
) of 18 U.S.C. §§ 2252A(a)(2) and (b)(1)
) (Count 4);

) Possession of child pornography, in
) violation of 18 U.S.C §§ 2252A(a)(5)(B)
) and (b)(2) (Counts 5 to 8).

22 **THE GRAND JURY CHARGES THAT:**

COUNT ONE

Distribution of Child Pornography

On or about April 5, 2019, to April 20, 2019, in the State and Federal District of Nevada, and elsewhere,

BENJAMIN D. MORROW,

defendant herein, did knowingly distribute using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by a means that included by computer, child pornography, as defined in Title 18, United States Code, Section 2256(8), to a person he believed to be R.T., in violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT TWO

Distribution of Child Pornography

On or about November 2018 to April 20, 2019, in the State and Federal District of Nevada, and elsewhere,

BENJAMIN D. MORROW,

defendant herein, did knowingly distribute using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by a means that included by computer, child pornography, as defined in Title 18, United States Code, Section 2256(8), to a person he believed to be D.W., in violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT THREE

Advertising of Child Pornography

Beginning on a date unknown and continuing to April 20, 2019, in the State and Federal District of Nevada, and elsewhere,

1 BENJAMIN D. MORROW,
2 defendant herein, did knowingly make, print, and publish, and caused to be made,
3 printed, and published, a notice and advertisement seeking or offering to receive,
4 exchange, buy, produce, display, distribute, and reproduce, a visual depiction, that
5 involved the use of a minor engaging in sexually explicit conduct and such visual
6 depiction was of such conduct; and such notice and advertisement was transported using a
7 means and facility of interstate and foreign commerce and in and affecting interstate and
8 foreign commerce by a means that included by computer, in violation of Title 18, United
9 States Code, Sections 2251(d)(1)(A) and (e).

10 **COUNT FOUR**

11 **Receipt of Child Pornography**

12 Beginning on a date unknown and continuing to on or about April 20, 2019, in the
13 State and Federal District of Nevada, and elsewhere,

14 BENJAMIN D. MORROW,
15 defendant herein, did knowingly receive child pornography, as defined in Title 18, United
16 States Code, Section 2256(8), and material containing child pornography, that had been
17 shipped and transported in and affecting interstate and foreign commerce by a means that
18 included by computer, in violation of Title 18, United States Code, Sections 2252A(a)(2)
19 and (b)(1).

20 **COUNT FIVE**

21 **Possession of Child Pornography**

22 Beginning on a date unknown and continuing to on or about April 20, 2019, in the
23 State and Federal District of Nevada,

24 BENJAMIN D. MORROW,

1 defendant herein, did knowingly possess a book, magazine, periodical, film, videotape,
2 computer disk, and other material, namely a Hitachi hard drive bearing serial number
3 YAG7A8XS, that contained an image of child pornography, as defined in Title 18, United
4 States Code, Section 2256(8), that had been shipped and transported using a means and
5 facility of interstate and foreign commerce and in and affecting interstate and foreign
6 commerce by a means that included by computer, and that was produced using materials
7 that had been mailed, and shipped and transported in and affecting interstate and foreign
8 commerce by a means that included by computer, all in violation of Title 18, United States
9 Code, Sections 2252A(a)(5)(B) and (b)(2).

10 **COUNT SIX**

11 **Possession of Child Pornography**

12 **Beginning on a date unknown and continuing to on or about April 20, 2019, in the**
13 **State and Federal District of Nevada,**

14 **BENJAMIN D. MORROW,**

15 defendant herein, did knowingly possess a book, magazine, periodical, film, videotape,
16 computer disk, and other material, namely, a Seagate hard drive, bearing serial number
17 5QG0814F, that contained an image of child pornography, as defined in Title 18, United
18 States Code, Section 2256(8), that had been shipped and transported using a means and
19 facility of interstate and foreign commerce and in and affecting interstate and foreign
20 commerce by a means that included by computer, and that was produced using materials
21 that have been mailed, and shipped and transported in and affecting interstate and foreign
22 commerce by a means that included by computer, all in violation of Title 18, United States
23 Code, Sections 2252A(a)(5)(B) and (b)(2).

COUNT SEVEN

Possession of Child Pornography

Beginning on a date unknown and continuing to on or about April 20, 2019, in the State and Federal District of Nevada,

BENJAMIN D. MORROW,

defendant herein, did knowingly possess a book, magazine, periodical, film, videotape, computer disk, and other material, namely, a Hitachi hard drive, bearing serial number YAGYXSMT, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by a means that included by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by a means that included by computer, all in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

COUNT EIGHT

Possession of Child Pornography

Beginning on a date unknown and continuing to on or about April 20, 2019, in the State and Federal District of Nevada,

BENJAMIN D. MORROW,

defendant herein, did knowingly possess a book, magazine, periodical, film, videotape, computer disk, and other material, namely, a Samsung hard drive, bearing serial number SOVVJIGP500093, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign

1 commerce by a means that included by computer, and that was produced using materials
2 that had been mailed, and shipped and transported in and affecting interstate and foreign
3 commerce by a means that included by computer, all in violation of Title 18, United States
4 Code, Sections 2252A(a)(5)(B) and (b)(2).

5 **FORFEITURE ALLEGATION**

6 **Distribution of Child Pornography; Advertising of Child Pornography; Receipt of Child**
7 **Pornography; and Possession of Child Pornography**

8 1. The allegations contained in Counts One through Eight of this Indictment are
9 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
10 pursuant to 18 U.S.C. § 2253(a)(1) and 2253(a)(3).

11 2. Upon conviction of any of the felony offenses charged in Counts One through
12 Eight of this Indictment,

13 **BENJAMIN D. MORROW,**
14 defendant herein, shall forfeit to the United States of America, any visual depiction
15 described in 18 U.S.C. §§ 2251 and 2252A, or any book, magazine, periodical, film,
16 videotape, or other matter which contains any such visual depiction, which was produced,
17 transported, mailed, shipped or received in violation of 18 U.S.C. §§ 2251(d)(1)(A),
18 2252A(a)(2), and 2252A(a)(5)(B) and shall forfeit to the United States of America, any
19 property, real or personal, used or intended to be used to commit or to promote the
20 commission of 18 U.S.C. §§ 2251(d)(1)(A), 2252A(a)(2), and 2252A(a)(5)(B) or any
21 property traceable to such property:

- 22 1. Apple iPhone with black Spigen case with sim cards;
23 2. Apple laptop (gray) with charger;
24 3. Black LG tablet with case;

4. Hitachi hard drive, with serial number YAG7A8XS;
5. Seagate hard drive, with serial number 5QGO814F;
6. Hitachi hard drive, with serial number YAGYXSMT;
7. LG flip phone (black);
8. HTC Sprint phone (black);
9. Samsung hard drive, with serial number SOVVJIGP500093;
10. Apple iPhone with case (black);
11. Apple iPod 80GB (black/silver);
12. Rally2 2GB flash drive (black/silver);
13. IBM Thinkpad, with serial number FX-R9026 (black);
14. Apple Macbook, with serial number 4H649KP2WGL (white);
15. Ridata 16GB flash drive (black);
16. 2 white sim cards;
17. Samsung flip phone (black);
18. Dell Latitude E4200 laptop;
19. Apple iPad with case (black);
20. HP computer tower, with serial number MXX850026B;
21. HP flash drive 8GB;
22. Apple iPod with charger (black);
23. Apple iPod with charger (gray);
24. GoPro Hero 4 (gray);
25. Lexar SD card 4 GB (black); and
26. TMCC flash drive (black).

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1 All pursuant to 18 U.S.C. §§ 2251(d)(1)(A), 2252A(a)(2), 2252A(a)(5)(B), 2253(a)(1), and
2 2253(a)(3).

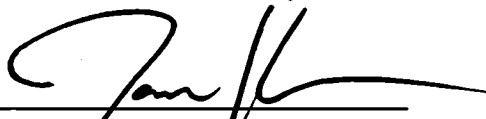
3 DATED: this 2nd day of August, 2019.

4 A TRUE BILL:

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6 

FOREPERSON OF THE GRAND JURY

7 NICHOLAS A. TRUTANICH
8 United States Attorney

9 
10 JAMES E. KELIER
11 ANDOLYN JOHNSON
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